

# Exhibit A

**From:** Young, Blanca <Blanca.Young@mto.com>  
**Sent:** Friday, January 28, 2022 2:11 PM  
**To:** Andrew Grimm  
**Cc:** Gregory Keenan; Megan Verrips; Rory Stevens; James Banker; Daniel Tully; Andrew Grimm; Greg Keenan; Guevara, Juana E.; Bryant, Jennifer; Batza, Cory M.; Ryan A. Hamilton  
**Subject:** RE: Estate of Bella Herndon v. Netflix - Attorney Conferral  
**Attachments:** Joint Stipulation to Continue Motion for Attorneys' Fees (Herndon v. Netflix).docx; Proposed Order - Joint Stipulation to Continue Motion for Attorneys' Fees (Herndon v. Netflix).docx

Andrew, thanks for your email. Attached is a draft stipulation and proposed order. To date, fees are about \$700,000. Please let us know if the stipulation looks OK and if we have your authorization to file it, which we'd like to do today.

Best, Blanca

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**From:** Andrew Grimm <[andrew@digitaljusticefoundation.org](mailto:andrew@digitaljusticefoundation.org)>  
**Sent:** Friday, January 28, 2022 5:48 AM  
**To:** Young, Blanca <[Blanca.Young@mto.com](mailto:Blanca.Young@mto.com)>  
**Cc:** Gregory Keenan <[gregory@digitaljusticefoundation.org](mailto:gregory@digitaljusticefoundation.org)>; Megan Verrips <[megan@informationdignityalliance.org](mailto:megan@informationdignityalliance.org)>; Rory Stevens <[rorylawstevensesq@gmail.com](mailto:rorylawstevensesq@gmail.com)>; James Banker <[jimbanker@googlemail.com](mailto:jimbanker@googlemail.com)>; Daniel Tully <[Daniel@hamlegal.com](mailto:Daniel@hamlegal.com)>; Andrew Grimm <[agrimm3@gmail.com](mailto:agrimm3@gmail.com)>; Greg Keenan <[gwkeen24@gmail.com](mailto:gwkeen24@gmail.com)>; Guevara, Juana E. <[Juana.Guevara@mto.com](mailto:Juana.Guevara@mto.com)>; Bryant, Jennifer <[Jennifer.Bryant@mto.com](mailto:Jennifer.Bryant@mto.com)>; Batza, Cory M. <[Cory.Batza@mto.com](mailto:Cory.Batza@mto.com)>; Ryan A. Hamilton <[Ryan@hamlegal.com](mailto:Ryan@hamlegal.com)>  
**Subject:** RE: Estate of Bella Herndon v. Netflix - Attorney Conferral

Blanca,

Thank you for your email. We also hope you are well. Our team enjoyed the chance to meet you, even if remotely, at the hearing.

We are inclined to agree with you that it would be more efficient and pragmatic to do what you suggest and we will so advise our clients.

As we approach our clients to obtain their authorization to so stipulate, could you please let us know your best estimate of the fees (hours and proposed rate) you anticipate seeking? That will help our clients to make an informed decision regarding the stipulation. We don't anticipate that this will be a sticking point but we do anticipate, based upon prior communications with them, that our clients will ask for this information and we think it's important we have a response so that they can make an informed decision.

If you want to send over the proposed stipulation as well, we are happy to start reviewing it to expedite the filing. I anticipate you'll want to file a stipulation today, Friday, January 28, 2022, so our simultaneous review as we obtain client authorization for the stipulation will speed up the process.

Best regards,

Andrew Grimm  
Attorney  
DIGITAL JUSTICE FOUNDATION  
(531) 210-2381  
[digitaljusticefoundation.org](https://digitaljusticefoundation.org)  
Email: [andrew@digitaljusticefoundation.org](mailto:andrew@digitaljusticefoundation.org)

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**From:** Young, Blanca <[Blanca.Young@mto.com](mailto:Blanca.Young@mto.com)>  
**Sent:** Thursday, January 27, 2022 3:34 AM  
**To:** Andrew Grimm <[andrew@digitaljusticefoundation.org](mailto:andrew@digitaljusticefoundation.org)>; Ryan A. Hamilton <[Ryan@hamlegal.com](mailto:Ryan@hamlegal.com)>  
**Cc:** Gregory Keenan <[gregory@digitaljusticefoundation.org](mailto:gregory@digitaljusticefoundation.org)>; Megan Verrips <[megan@informationdignityalliance.org](mailto:megan@informationdignityalliance.org)>; Rory Stevens <[rorylawstevenssq@gmail.com](mailto:rorylawstevenssq@gmail.com)>; James Banker <[jimbanker@googlemail.com](mailto:jimbanker@googlemail.com)>; Daniel Tully <[Daniel@hamlegal.com](mailto:Daniel@hamlegal.com)>; Andrew Grimm <[agrimm3@gmail.com](mailto:agrimm3@gmail.com)>; Greg Keenan <[gwkeen24@gmail.com](mailto:gwkeen24@gmail.com)>; Guevara, Juana E. <[Juana.Guevara@mto.com](mailto:Juana.Guevara@mto.com)>; Bryant, Jennifer <[Jennifer.Bryant@mto.com](mailto:Jennifer.Bryant@mto.com)>; Batza, Cory M. <[Cory.Batza@mto.com](mailto:Cory.Batza@mto.com)>  
**Subject:** RE: Estate of Bella Herndon v. Netflix - Attorney Conferral

Hi Andrew and Ryan, I hope you are well. We believe it would be most efficient for any fee motion to be made after appeals are exhausted. I assume plaintiffs would want to stay any such motion until appeals are exhausted as well. Can we agree to stipulate to extend the time? If so, we'll send over a stipulation.

Best, Blanca